

EXHIBIT 220-B

**Calculation of Ten-year Moving Average for
Number of Days with Water Rights Releases**

(1989 THROUGH 2000 BASED ON REPORTED WR89-18 OPERATIONS)

Calendar Year	Spill [Acre-ft]	Designated Release Year	Number of Release Days	Number of Release Days in Designated Years	Cumulative Number of Designated Years	Moving Ten-year Average [days]
1953	N	Y	39	39	1	
1954	N	Y	84	84	2	
1955	N	Y	105	105	3	
1956	N	Y	73	73	4	
1957	N	Y	98	98	5	
1958	Y	N	0			
1959	Y _(a)	Y	10	10	6	
1960	N	Y	53	53	7	
1961	N	Y	45	45	8	
1962	Y	N	0			
1963	N	Y	25	25	9	
1964	N	Y	30	30	10	56
1965	N	Y	58	58	11	58
1966	N	Y	64	64	12	56
1967	Y	N	0			
1968	N	Y	87	87	13	54
1969	Y _(b)	N	0			
1970	N _(c)	N	71			
1971	N	Y	114	185	14	66
1972	N	Y	131	131	15	69
1973	Y	N	0			
1974	Y _(a)	Y	18	18	16	70
1975	Y _(a)	Y	13	13	17	66
1976	N	Y	54	54	18	67
1977	N	Y	29	29	19	67
1978	Y	N	1			
1979	Y	N	19			
1980	Y	N	0			
1981	N	Y	84	104	20	74
1982	N	Y	92	92	21	78
1983	Y _(b)	N	0			
1984	Y _(a,c)	N	64			
1985	N	Y	108	172	22	89
1986	N	Y	70	70	23	87
1987	N	Y	20	20	24	70
1988	N	Y	50	50	25	62
1989	N	Y	28	28	26	63
1990	N	Y	31	31	27	65
1991	N	Y	68	68	28	66
1992	N	Y	61	61	29	70
1993	Y _(d)	N	0			
1994	N	Y	100	100	30	69
1995	Y _{(d),(e)}	N	0			
1996	N	Y	105	105	31	71
1997	N	Y	112	112	32	65
1998	Y _(b)	N	0			
1999	N	N	0			
2000	Y _(a)	Y	76	76	33	65
				Average	69	68
				Minimum	10	54

(a) Spills less than 20,000 acre-feet

(b) Spills exceeded 300,000 acre-feet

(c) Both 1970 and 1984 (following spill years exceeding 300,000 acre-feet) include releases, because this period was not as wet as 1990s.

(d) For the purpose of this calculation, spills are treated to be less than 100,000 acre-feet.

(e) Seismic operation with enhanced spills